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June 23, 2025

Via ECF

Hon. Joan M. Azrack, U.S.D.J.
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722
Attn: Magistrate Judge Steven L. Tiscione, U.S.M.J.

Re: *Thomson v. The Research Foundation for the SUNY*
Docket No. 2:24-CV-00037

Dear Judge Tiscione:

Cervini Law Group PLLC represents plaintiff Donna Thomson (“**Plaintiff**”) in the referenced action (the “**Action**”) with defendant The Research Foundation for The State University of New York (“**Defendant**,” and together with Plaintiff referred to collectively as the “**Parties**”). We submit this joint letter in response to the Court’s Order dated June 16, 2025, which requested that the Parties provide the Court with dates and names of the remaining deponents in this Action. The Parties have agreed upon the proposed schedule and are just awaiting final confirmation from two (2) of the deponents.

The deposition schedule is as follows for the remaining deponents:

- (i) June 24: Donna Thomson (beginning at 10:30 am);
- (ii) July 2: Samantha Lester, Dakota Arocho, and Tina Langrock (beginning at 10:00 am);
- (iii) July 17: Julie Broihier (beginning at 10:00 am);
- (iv) July 23: Bill Haupt and Michele Camacho (beginning at 11:30 am);

- (v) August 5: Karen Levie (beginning at 10:00 am);
- (vi) August 26: Dr. Benjamin Luft (beginning at 10:00 am);
- (vii) Danielle Rubino: Deponent is currently on leave and will confirm a date for early August as soon as practicable; and
- (viii) Dr. Jeffrey Low: August 21 or 22 (awaiting final confirmation).

We thank the Court for its consideration of this matter.

Sincerely,

CERVINI LAW GROUP PLLC

By: Joseph P. Cervini, Jr.
Joseph P. Cervini, Jr.

cc: All Counsel of Record (Via ECF)